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18 UNITED STATES DISTRICT COURT
19 DISTRICT OF NEVADA

20 Cung Le, Nathan Quarry, Jon Fitch, Brandon
21 Vera, Luis Javier Vazquez, and Kyle
Kingsbury, on behalf of themselves and all
22 others similarly situated,

23 Plaintiffs,

24 v.

25 Zuffa, LLC, d/b/a Ultimate Fighting
Championship and UFC,

26 Defendant.

27 No.: 2:15-cv-01045-RFB-(BNW)

28 **JOINT MOTION FOR EXTENSION OF
TIME TO FILE UNSEALED RECORD**

(Second Request)

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Local Rules IA 6-1 and 26-3 of this Court, Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury (“Plaintiffs”) and Defendant Zuffa, LLC (“Zuffa,” and collectively with Plaintiffs, the “Parties”), hereby jointly submit this motion for an extension of time to file the supplemental unsealed record.

On August 21, 2023, the Court ordered the Parties to jointly file the unsealed record, except for personal identifying information and medical information, no later than October 31, 2023. *See* Aug. 21, 2023 Hr’g Tr. at 34-37, ECF No. 846; ECF No. 847. The Court granted the Parties’ first request to extend the deadline to December 15, 2023. ECF No. 891. The Parties respectfully move the Court to extend the deadline to December 22, 2023. This is the Parties’ second motion for an extension of time to file the unsealed record.

The Parties continue to meet and confer regarding the joint unsealing, have made significant progress since the first extension request, and, pursuant to LRs IA 6-1 and 26-3, have good cause for their request for an extension. As the Court acknowledged in the August 21, 2023, hearing, the process of reviewing the entire voluminous record is a “difficult process because of the amount of discovery” that occurred in this case. Aug. 21, 2023 Hr’g Tr. 35:1-2. Good cause exists due to the large size and age of the record in this case, and also—as the Court stated—the importance of submitting a thorough and complete record that appropriately balances “the public interest as it relates these records,” on the one hand, with the importance of safeguarding individuals’ “personal-identifying information” and “medical information,” on the other hand. *Id.* 34:11-25. These factors, as well as the Parties’ attention to other pressing aspects of this case—including Zuffa’s October 24, 2023 motion for summary judgment, ECF Nos. 878-880, and December 8, 2023 motions to exclude Dr. Hal J. Singer, Guy A. Davis, and Dr. Andrew Zimbalist,

1 ECF Nos. 929-931, and Plaintiffs' motion to strike, ECF No. 933—weigh heavily in favor of
2 granting the Parties' joint motion for an extension of time to file the unsealed record.
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1 Respectfully Submitted,

2 By: /s/ Eric L. Cramer
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Dated: December 15, 2023

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22 *Individual and Representative Plaintiffs.*

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2 **CERTIFICATE OF SERVICE**
3

4 The undersigned hereby certifies that the foregoing Parties' Joint Motion for
5 Extension of Time to File Unsealed Record was served on December 15, 2023, via the Court's
6 CM/ECF electronic filing system addressed to all parties on the e-service list.
7

8 Dated: December 15, 2023
9

10 */s/ William A. Isaacson*
11 William A. Isaacson
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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury on behalf of themselves and all others similarly situated.

Plaintiffs,

V.

Zuffa, LLC, d/b/a Ultimate Fighting Championship
and UFC.

Defendant:

Case No.: 2:15-cv-01045-RFB-(BNW)

**[PROPOSED] ORDER GRANTING
THE PARTIES' JOINT MOTION
FOR EXTENSION OF TIME TO
FILE UNSEALED RECORD**

1 Before this Court is the Parties' Joint Motion for Extension of Time to File Unsealed
2 Record, filed by Defendant Zuffa, LLC ("Zuffa"), and Plaintiffs Cung Le, Nathan Quarry, Jon
3 Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury ("*Le* Plaintiffs") (collectively
4 "the Parties").
5

6 The Court finds that good cause exists and that a modification of the December 15, 2023
7 deadline previously set by the Court is appropriate. Therefore, the new operative deadline for the
8 Parties to jointly file the unsealed record, exception for personal identifying information and
9 medical information, is no later than December 22, 2023.
10
11

IT IS SO ORDERED.

DATED: Dec. 15, 2023

By: _____



Hon. Richard F. Boulware, II
UNITED STATES DISTRICT JUDGE